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HURRELL CANTRALL LLP

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3 4 5 6	E-Mail: istern@hurrellcantrall.com Nicole G. Ortega, State Bar No. 345882 E-Mail: nortega@hurrellcantrall.com HURRELL CANTRALL LLP 800 West 6th Street, Suite 700 Los Angeles, CA 90017-2710 Telephone: (213) 426-2000 Facsimile: (213) 426-2020	
7 8 9	Attorneys for Defendants, COUNTY OF BRENDA ALCANTARA	LOS ANGELES, BLAKE RUNGE and
10	UNITED STATES DISTRICT COURT	
11	CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION	
12		
13	URSULA BYRAM, S.B. by and	Case No. 2:23-cv-09285-KS
14	through guardian ad litem TIMOTHY BYRAM, N.B. by and through guardian ad litem TIMOTHY BYRAM, and A.B.	JOINT STATUS REPORT RE STATUS OF SETTLEMENT
15	by and through guardian ad litem KAITLYN HUMENCHUK,	[Assigned to Hon. Karen L. Stevenson
16	individually and as successors-in- interest to Everett Byram,	Courtroom 580]
17	Plaintiffs,	
18	V.	
19	COUNTY OF LOS ANGELES, BLAKE RUNGE, and BRENDA	
20	ALCANTARA,	
21 22	Defendants.	
23		
24	TO THIS HONORABLE COUR	Γ:
25		NGELES, DEPUTY BLAKE RUNGE

Thomas C. Hurrell, State Bar No. 119876 E-Mail: <a href="mailto:thurrell@hurrellcantrall.com">thurrell@hurrellcantrall.com</a>

## INT STATUS REPORT RE ATUS OF SETTLEMENT

LES, DEPUTY BLAKE RUNGE (#626632) and DEPUTY BRENDA ALCANTARA(#606061) and Plaintiffs URSULA BYRAM, S.B. by and through guardian ad litem TIMOTHY BYRAM, N.B. by and through guardian ad litem TIMOTHY BYRAM, and A.B. by and

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through guardian ad litem KAITLYN HUMENCHUK, individually and as successors-in-interest to Everett Byram ("Parties") jointly, submit this status report in response to the Court's August 25, 2025, order setting a telephonic status conference for November 24, 2025.

## **RECITALS**

- On January 15, 2025, the Parties filed a Notice of Settlement requesting 1. that the Court vacate all dates in the case.
- 2. On January 16, 2025, the Court issued an Order vacating all dates and instructing the Parties to file a joint stipulation for dismissal within 90 days.
- 3. The Parties fully executed the settlement agreement on January 22, 2025.
- 4. The settlement is conditioned upon the approval by the relevant Los Angeles County boards, including the Los Angeles County Claims Board and the Board of Supervisors. The process of obtaining approvals from the Los Angeles County Claims Board and Board of Supervisors is expected to take 12 months from the date the settlement agreement is fully executed by the parties.
- 5. The Los Angeles County Board of Supervisors has established protocols in lawsuits. Where the liability of the settlement or judgment exceeds \$100,000, a Corrective Action Plan (CAP) (a confidential document) and a Summary Corrective Action Plan (SCAP) (a public record) must be produced.
- 6. After the subject settlement agreement was fully executed, the settlement moved on to the CAP phase. The CAP process involves several steps in its preparation, including investigation, drafting, and revisions, followed by approval of multiple levels of LASD personnel. The County is in the CAP process phase of the approvals process.
- 7. Once the final review and signatures are completed in the CAP process, the matter will be placed on the agenda for approval by the Claims Board.
  - 8. After approval by the Claims Board, the matter will typically go before

Case

the Board of Supervisors within a	approximately 60 days. After the County Board of	
Supervisors' approval, the settlen	nent documents and Plaintiffs' payment instructions	
will be submitted to the Los Ang	eles County Auditor-Controller, and then the	
settlement payment will be issued	d.	
9. The Claims Board a	The Claims Board approval process is proceeding as anticipated and	
should be finalized within the pro-	ojected 12 month timeline.	
10. The Parties request t	the Court allow additional time for the settlement	
approval process to proceed.		
11. Accordingly, the Par	rties request that the Court set a status conference	
in approximately six (6) months	so that the parties may update the Court regarding	
the status of the approval of the s	ettlement.	
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DATED: November 17, 2025	LAW OFFICES OF DALE K. GALIP	
	By: <u>/s/ Dale K. Galipo</u>	
	DALE K. GALIPO	
	COOPER ALISON-MAYNE Attorneys for Plaintiffs	
	Auomeys for Flamums	
DATED: November 17, 2025	HURRELL CANTRALL LLP	
	By: /s/ Nicole G. Ortega	
	THOMAS C. HURRELL JORDAN S. STERN	
	NICOLE G. ORTEGA	
	Attorneys for Defendants, COUNTY OF	
	LOS ANGELES, BLAKE RUNGE and BRENDA ALCANTARA	